

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

MATTHEW ALBRIGHT, Individually and on  
Behalf of All Others Similarly Situated,

Plaintiff,

v.

TERRAFORM LABS, PTE. LTD., JUMP  
TRADING LLC, DELPHI DIGITAL  
CONSULTING, INC., DO KWON,  
NICHOLAS PLATIAS, LUNA  
FOUNDATION GUARD LTD., JOSE  
MACEDO, KANAV KARIYA, and REMI  
TETOT,

Defendants.

Civil Action No. 1:22-cv-07281

Hon. Jed S. Rakoff

**DECLARATION OF DOUGLAS W. HENKIN IN SUPPORT OF REPLY IN FURTHER  
SUPPORT OF TERRAFORM LABS, PTE. LTD, LUNA FOUNDATION GUARD LTD. AND DO  
KWON'S MOTION TO DISMISS THE AMENDED CLASS ACTION COMPLAINT  
PURSUANT TO FEDERAL RULES OF CIVIL PROCEDURE 12(B)(2) AND 12(B)(6)**

Douglas W. Henkin declares, pursuant to 28 U.S.C. § 1746, as follows:

1. I am an attorney duly admitted to practice law before this Court and a partner with the law firm of Dentons U.S. LLP, counsel for Defendants Terraform Labs Pte. Ltd, Luna Foundation Guard Ltd, and Do Kwon in the above-captioned action. I make this Declaration in support of the Reply in Further Support of the Motion to Dismiss filed by TFL, LFG, and Mr. Kwon. This declaration is based on my personal knowledge except as otherwise indicated.

2. Attached hereto are true and correct copies of the following documents:

Exhibit A. LinkedIn Profile of Matthew Albright of Guaynabo, Puerto Rico.

Exhibit B. Starship Whitepaper, October 2021.

Exhibit C. Typhoon Network Archive Article, *On Matthew Albright, Sonar and Getting \$200,000 Stolen*, May 10, 2021.

Exhibit D. Telegram posts by Matthew Albright on May 11, 2022.

Exhibit E. U.S. Congressional Research Service, *In Focus: The U.S. Dollar as the World's Dominant Reserve Currency*, Updated September 15, 2022.

Exhibit F. Government of the Virgin Islands Press Release, *Changing USD Currency Not An Option For The BVI*, December 13, 2019.

Exhibit G. Central Intelligence Agency, *The World Factbook: Ecuador*, December 14, 2022.

Exhibit H. Central Intelligence Agency, *The World Factbook: El Salvador*, December 14, 2022.

Exhibit I. Central Intelligence Agency, *The World Factbook: Federated States of Micronesia*, December 14, 2022.

Exhibit J. U.S. Department of State, *U.S. Relations With Marshall Islands*, December 9, 2021.

Exhibit K. Central Intelligence Agency, *The World Factbook: Palau*, December 14, 2022.

Exhibit L. The Government of the Turks & Caicos Islands, *Invest Turks & Caicos Islands*, 2014.

Exhibit M. Central Intelligence Agency, *The World Factbook: Zimbabwe*, December 13, 2022.

Exhibit N. N. Al-Naji, J. Chen, L. Diao, *Basis: A Price-Stable Cryptocurrency with an Algorithmic Central Bank*, June 4, 2018.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed on December 28, 2022 in New York, New York.

/s/ *Douglas W. Henkin*  
Douglas W. Henkin  
DENTONS US LLP  
1221 Avenue of the Americas  
New York, NY 10020  
Telephone: (212) 768-6832  
Facsimile: (212) 768-6800  
douglas.henkin@dentons.com